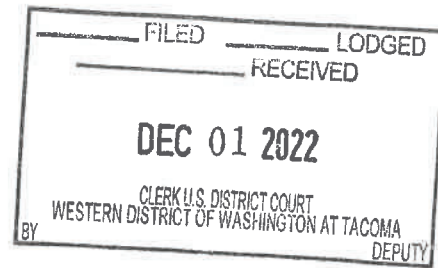


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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

LISA M DAVY

In Propria Persona

Plaintiff(s),

v.

Universal Language Services, Inc

Defendant(s).

CASE NO. 2:22cv1702JC
[to be filled in by Clerk's Office]

COMPLAINT FOR EMPLOYMENT
DISCRIMINATION

Jury Trial: ☒ Yes ☐ No

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s) **LISA M DAVY**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Lisa M. Davy</u>
Street Address	<u>6709 compton blvd SE</u>
City and County	<u>Lacey Thurston</u>
State and Zip Code	<u>Washington, 98513</u>
Telephone Number	<u>360.790.2781</u>

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1 B. Defendant(s) Universal Language Services, Inc

2 *Provide the information below for each defendant named in the complaint, whether the*
3 *defendant is an individual, a government agency, an organization, or a corporation. For an*
4 *individual defendant, include the person's job or title (if known). Attach additional pages if*
5 *needed.*

Defendant No. 1

6	Name	Universal Language Services, Inc
7	Job or Title (if known)	
8	Street Address	929 108th Ave NE #710
9	City and County	Bellevue, King
10	State and Zip Code	Washington, 98004
11	Telephone Number	425.450.7022

Defendant No. 2

12	Name	
13	Job or Title (if known)	
14	Street Address	
15	City and County	
16	State and Zip Code	
17	Telephone Number	

Defendant No. 3

18	Name	
19	Job or Title (if known)	
20	Street Address	
21	City and County	
22	State and Zip Code	
23	Telephone Number	

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Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name

Street Address

City and County

State and Zip Code

Telephone Number

II. BASIS FOR JURISDICTION

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

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- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

☒ Other federal law *(specify the federal law)*:
Civil Rights Act 1866 AD, Civil Rights Act 1870 AD., Civil Rights Act 1871 AD., Civil Rights Act 1964 AD., U.S.C. Section 242 Of Title 18

- ☒ Relevant state law *(specify, if known)*:

Washington Law Against Discrimination (WLAD)

- ☐ Relevant city or county law *(specify, if known)*:

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☒ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.

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- ☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Other federal law (specify the federal law):

- ☒ Relevant state law (specify, if known):

Washington Law Against Discrimination (WLAD)

- ☐ Relevant city or county law (specify, if known):

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. The discriminatory conduct of which I complain in this action includes (check all that apply):

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- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☐ Retaliation.

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☐ Other acts (*specify*): _____

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
November 5, 2021 or shortly after.

C. I believe that defendant(s) (*check one*):

☒ is/are still committing these acts against me.

☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

☐ race _____

☐ color _____

☐ gender/sex _____

☒ religion _____

☐ national origin _____

☐ age (*year of birth*) _____ (*only when asserting
a claim of age
discrimination.*)

☐ disability or perceived disability (*specify disability*) _____

E. The facts of my case are as follows. Attach additional pages if needed.

Universal Language Services, Inc. violated and deprived me of my

Constitutional Rights, Civil Rigjts, and my Human Rights.

(*Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.*)

See Exhibit XIII

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IV. EXHAUSTION OF FEDERAL ADMINISTRATIVE REMEDIES

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

May 26, 2021

B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.
☒ issued a Notice of Right to Sue letter, which I received on *(date)*

September 5, 2022

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

See Exhibit XVII

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

- ☐ 60 days or more have elapsed.
☐ less than 60 days have elapsed.

V. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

\$375,000.00 per EACH federal law violated by Universal Language Services, Inc, including but not limited to the following laws which have been violated; Civil Rights Act 1866 A.D., Civil Rights Act 1870 A.D., Civil Rights Act 1871 A.D., Civil Rights Act 1964 A.D., U.S.C, Section 242 Of Title 18 makes it a crime for a person acting under color of any laws to

Constitutional Rights listed to freedom of the unabridged expression of Religion, or Constitutional Rights listed to the protection of a Republican form of government of which the State of Washington by its initiatory process

VI. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: November 29, 2022
Signature of Plaintiff Lisa M. Davy
Printed Name of Plaintiff Lisa M. Davy

Date of signing: _____
Signature of Plaintiff _____
Printed Name of Plaintiff _____

Date of signing: _____
Signature of Plaintiff _____
Printed Name of Plaintiff _____

TABLE OF CONTENT

I	COVER SHEET
II	COMPLAINT FOR EMPLOYEMENT DISCRIMINATION
III	ATTACHMENT BRIEF
IV	BAPTISM CERTIFICATE
V	THE CONSTITUTION OF THE UNITED STATES
	A. THE CONSTITUTION OF THE STATE OF WASHINGTON
VI	TERRITORY OF WASHINGTON ACT
VII	TERRITORY OF WASHINGTON LAWS
VIII	PROCLAMATION BY THE GOVERNOR 20-05
VIX	PROCLAMATION BY THE GOVERNOR 20-14
X	PROCLAMATION BY THE GOVERNOR 21-14.1
XI	EMAIL FROM UNIVERSAL LANGUAGE SERVICES (ULS) NON-HCA, DIRECT BILLING (PRIVATE)
XII	EMAIL TO ULS, MY RELIGIOUS ACCOMODATION REQUEST
XIII	EMAIL FROM ULS, PROCLAMATION 21-14, ET SEQ. RELIGIOUS ACCOMODATION REQUEST FORM
XIV	EEOC FILING, CHARGE OF DISCRIMINATION AGAINST ULS
XV	NOTICE OF CHARGE OF DISCRIMINATION (TO ULS FROM EEOC)
XVI	POSITION STATEMENT FROM ULS
XVII	COMPLAINING PARTY'S REBUTTAL TO ULS'S POSITION STATEMENT
XVIII	DETERMINATION AND NOTICE OF RIGHTS-RIGHT TO SUE LETTER
XIX	LETTER FROM EEOC, CLOSING THE CLAIM
XX	LETTER FROM ATTORNEY GENERAL KEN EIKENBERRY'S OFFICE
XXI	NOTICE OF SERVICE